

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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(Admitted *pro hac vice*)

*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO  
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No. 23-01092 (MBK)

**DECLARATION OF DANIEL J. MERRETT IN SUPPORT OF  
DEBTOR'S MOTION FOR A BRIDGE ORDER CONFIRMING THE AUTOMATIC  
STAY APPLIES TO CERTAIN ACTIONS ASSERTED AGAINST AFFILIATES OR  
TEMPORARILY EXTENDING THE STAY AND PRELIMINARY INJUNCTION  
TO SUCH ACTIONS PENDING A FINAL HEARING ON THE REQUESTED RELIEF**

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

I, Daniel J. Merrett, hereby declare under penalty of perjury:

1. I am a partner of the law firm of Jones Day, and my office is located at 1221 Peachtree Street, N.E., Suite 400, Atlanta, Georgia 30361. I am a member in good standing of the Bar of the State of Georgia. My application to appear *pro hac vice* was approved by this Court [Dkt. 144]. There are no disciplinary proceedings pending against me.

2. I submit this declaration (the “Declaration”) in connection with the *Debtor’s Motion for a Bridge Order Confirming the Automatic Stay Applies to Certain Actions Asserted Against Affiliates or Temporarily Extending the Stay and Preliminary Injunction to Such Actions Pending a Final Hearing on the Requested Relief*, filed contemporaneously herewith. I have personal knowledge of the matters set forth herein.

3. Attached hereto as Exhibit 1 is a true and correct copy of the *Complaint and Jury Demand* filed in Cruz v. Kenvue, No. MID-L-002093-23, (N.J. Super. Ct. April 13, 2023).

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the transcript of the hearing held on April 18, 2023, before the United States Bankruptcy Court for the District of New Jersey in In re LTL Mgmt. LLC, Case No. 23-12825, Adv. Pro. No. 23-01092 (Bankr. D.N.J. Apr. 18, 2023).

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the hearing held on April 20, 2023, before the United States Bankruptcy Court for the District of New Jersey in In re LTL Mgmt. LLC, Case No. 23-12825, Adv. Pro. No. 23-01092 (Bankr. D.N.J. Apr. 20, 2023).

6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from volume 1 of the transcript of the hearing held on May 24, 2023, before the Superior Court of New Jersey, Middlesex County in Naranjo v. Johnson & Johnson, et al., Case No. L-6108-21AS.

7. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from volume 2 of the transcript of the hearing held on May 24, 2023, before the Superior Court of New Jersey, Middlesex County in Naranjo v. Johnson & Johnson, et al., Case No. L-6108-21AS.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the subpoena (with personal information redacted) issued by Mr. Placitella to: (i) Thibaut Mongon, Chief Executive Officer and Director of Kenvue; and (ii) Paul Ruh, Chief Financial Officer of Kenvue.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the transcript of the hearing held on May 30, 2023, before the United States Bankruptcy Court for the District of New Jersey in In re LTL Mgmt. LLC, Case No. 23-12825 (Bankr. D.N.J. May 30, 2023).

10. Attached hereto as **Exhibit 8** is a true and correct copy of the May 31, 2023 letter from Mr. Placitella to the Superior Court of New Jersey, Middlesex County in Naranjo v. Johnson & Johnson, et al., Case No. L-6108-21AS, without exhibits.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 31, 2023  
Atlanta, Georgia

Respectfully submitted,

/s/ Daniel J. Merrett  
Daniel J. Merrett